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March 11, 2021

Hon. Laura Taylor Swain
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Constantinescu, et al.*
Dkt. No.: 19-CR-651

Dear Judge Swain:

I am CJA counsel to Defendant Florian Martin. Mr. Martin is currently scheduled for a remote conference before Your Honor on March 24, 2021. I write to respectfully request a one-month adjournment of the scheduled conference date.

We continue to engage the government in plea negotiations and to review discovery. We are also continuing to work with the government and the BOP to ensure Mr. Martin's access to discovery and to work through issues which have hampered Mr. Martin's ability to view some of the electronic discovery which has been provided to him at the MCC. We believe it is important for Mr. Martin to review this discovery so that he may participate in his own defense as well as the plea bargaining process. For these reasons, we are respectfully requesting a one-month adjournment.

I have spoken with the government, by AUSA Elizabeth Hanft, who consents to this request.

Mr. Martin consents to the exclusion of time from the speedy trial clock from today through whichever adjourn date is convenient to the Court.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone, Esq.

Cc: Elizabeth Hanft, Esq.
Assistant United States Attorney

Robert Sobelman, Esq.
Assistant United States Attorney

Samuel Rothschild, Esq.
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The application is granted. The conference is adjourned to April 23, 2021, at 10:30 a.m. The Court finds pursuant to 18 U.S.C. §3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through April 23, 2021, outweigh the best interests of the public and the defendant(s) in a speedy trial for the reasons stated above. DE# 540 resolved.

SO ORDERED.

Dated: 3/11/2021

/s/Laura Taylor Swain, USDJ